

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

**IN RE: VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC. SECURITIES  
LITIGATION**

Civil Action No. 15-7658

JUDGE MICHAEL A. SHIPP  
JUDGE LOIS H. GOODMAN

THIS DOCUMENT RELATES TO:

18-cv-15286-MAS-LHG (Northwestern  
Mutual Life Insurance Co.)

**STIPULATION AND ~~PROPOSED~~ ORDER**

WHEREAS, on October 24, 2018, Plaintiffs in the above-captioned action (the “Action”) filed a Complaint (the “Complaint”) against Valeant Pharmaceuticals International, Inc., n/k/a Bausch Health Companies Inc. (“Valeant”), J. Michael Pearson, Howard B. Schiller, Robert L. Rosiello, and Tanya Carro (collectively, “Defendants,” and together with Plaintiffs, the “Parties”);

WHEREAS, on January 18, 2019, counsel for Defendants agreed to accept service of the Complaint (ECF No. 6);

WHEREAS, Defendants filed motions to dismiss on February 8, 2019, to which Plaintiffs filed opposition on March 8, 2019;

WHEREAS, Defendants filed replies in support of their motions to dismiss on March 29, 2019;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, that:

(a) Defendants, to the extent all claims against a defendant have not been dismissed, will file answers to the Complaint within 60 days of the Court's ruling on the motions to dismiss;

(b) The Parties will confer about the paragraphs of the Complaint that the Defendants will answer within two weeks of the Court's decision on the motions to dismiss.

Stipulated and agreed to by:

DATED: April 24, 2019

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So Ordered this 26<sup>th</sup> day  
of April, 2019  
H. Shipp  
Hon. Michael Shipp, USDJ